

### REMARKS

In an Office Action mailed on July 5, 2005, an objection was made to the Abstract; an objection was made to the title; objections were made to the drawings; objections were made to claims 2, 3 and 21; claims 1, 2, 8, 19, 20, 22, 24, 28 and 29-35 were rejected under 35 U.S.C. § 102(a) as being anticipated by George; claim 3 was rejected under 35 U.S.C. § 103(a) as being unpatentable over George in view of Strattan; claims 4 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over George in view of Floyd; claims 5, 6 and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over George in view of Ringgenberg; claims 3 and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over George in view of Fenton; claims 9-15, 17, 18 and 25-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over George in view of Gano; claims 9-15, 17, 18 and 25-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over George in view of Shy; claim 16 was rejected under 35 U.S.C. § 103(a) as being unpatentable over George in view of Gano and further in view of Donnelly; and claim 16 was rejected under 35 U.S.C. § 103(a) as being unpatentable over George in view of Shy and further in view of Donnelly.

The term "hangar" has been replaced with "hanger" to overcome the corresponding objections to claims 2 and 3. Claim 21 has been cancelled. The title has been amended, as suggested by the Examiner, to overcome the corresponding objection. The Abstract has also been re-written to overcome the corresponding objection. Regarding the objection to the drawings, claim 30 has been amended to recite that the continuous medium includes a coiled tubing, as the scope of "continuous medium" in independent claim 29 is sufficient to cover continuous media other than coiled tubing, such as a wireline or a slickline. The §§ 102 and 103 rejections are addressed below.

#### §§ 102 and 103 Rejections of Claims 1-18:

As amended, the one-trip system of independent claim 1 includes a tubing hanger, a production tubing and a perforating gun assembly and a screen assembly. The tubing hanger is adapted to be mounted to one of a well in the well casing near the earth's surface. The production tubing is sealingly attached to the tubing hanger, and the perforating gun assembly is coupled to the production tubing. The tubing hanger, production tubing, perforating gun assembly and screen assembly are adapted to be run downhole as a unit. Once the unit is

positioned downhole the screen assembly is adapted to be moved relative to the production tubing by a riglessly-deployed continuous medium that is deployed through the production tubing from the surface of the well.

Contrary to the limitations of amended independent claim 1, George discloses a system that is lowered downhole on a pipe string 3, and this same pipe string 3 is used for purposes of manipulating the position of a production screen, such as the production screen 13 that is depicted in Fig. 4 of George, for example. Thus, a potential disadvantage of this arrangement, as compared to the advantages that flow from the claimed invention, is that the presence of a rig may be required for purposes of manipulating the position of the production screen 13.

George only describes removal of the rig after the screen 13 is moved into position. For example, in connection with the embodiment disclosed in Figs. 13-18 of George, George discloses the screen as being connected to a perforating gun assembly. However, removal of the rig occurs after the perforating gun assembly is ready to be fired. *See, for example*, lines 53-55 in column 11. George does not, however, teach or suggest manipulating the position of the screen via a riglessly-deployed continuous medium that is deployed through the pipe string 3. As such, George fails to anticipate amended independent claim 1.

Claims 2-18 are patentable for at least the reason that these claims depend from an allowable claim.

#### §§ 102 and 103 Rejections of Claims 29-34:

As amended, the method of independent claim 29 includes providing a one-trip completion system and placing the one-trip completion system in its proper position in the well using a rig. The method includes removing the rig; and the method includes after the removal of the rig, running a continuous medium downhole into the one-trip completion system and actuating and operating the one-trip completion system using the continuous medium.

Contrary to the limitations of amended independent claim 29, George fails to teach or even suggest running a continuous medium downhole into a one-trip completion system after the removal of a rig (used to deploy the system) and actuating and operating the one-trip completion system using the continuous medium. Rather than such an arrangement, George teaches manipulating its system using the pipe string 13 that is also used to run the assembly downhole. Thus, George implies, if not teaches, that the tubing 3 is used in connection with a rig. *See, for*

*example*, the discussion concerning Figs. 13-18 of George, which states once the packer 18 is in the appropriate position, the rig is removed. George does not teach or even suggest running a continuous medium downhole into its system for purposes of actuating and operating the system after removal of the rig. Therefore, for at least this reason, George fails to anticipate amended independent claim 29.

Claims 30-34 are patentable for at least the reason that these claims depend from an allowable claim.

§ 102 Rejection of Claim 35:

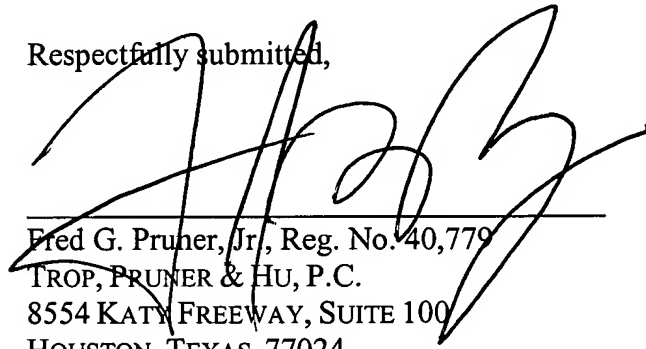
The method of independent claim 35 recites placing a one-trip completion system in a desired location in a well using a rig; and claim 35 cites after removal of the rig, running a continuous medium downhole to engage a sand screen of the system and move the sand screen to a position adjacent perforations.

See discussion of independent claims 1 and 29 above. In particular, George fails to teach or even suggest after the removal of a rig (used to deploy its system), running a continuous medium downhole to engage a sand screen. For at least this reason, George fails to anticipate amended independent claim 35.

CONCLUSION

In view of the foregoing, withdrawal of the §§ 102 and 103 rejections and a favorable action in the form of a Notice of Allowance are requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0295US).

Respectfully submitted,



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